

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DAVISON DESIGN & DEVELOPMENT,  
INC.

Plaintiff,

v.

LEADVISION MEDIA, LLC d/b/a  
REVENUEADS, et al.,

Defendants.

No. CIV-14-118-F

The Honorable Stephen P. Friot

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant LeadVision Media, LLC d/b/a RevenueAds ("LeadVision") respectfully moves the Court for an extension of time until and through May 27, 2014, for LeadVision to respond to plaintiff's complaint filed at ECF No. 1. Good cause exists to grant the requested extension because counsel requires additional time to review and confer with the client as to how to respond to the complaint and to prepare such response. In further support of this motion, LeadVision states:

1. Plaintiff filed its initial complaint on February 5, 2014. (ECF No. 1.) Plaintiff served his complaint on the Secretary of State of Oklahoma on April 28, 2014. Accordingly, LeadVision's response to the complaint is due on May 19, 2014.

2. As of this filing, counsel for LeadVision has not had adequate time to fully review or evaluate the allegations in plaintiff's complaint and prepare a response to the

complaint based on that review and evaluation. Thus, good cause exists to grant the requested extension to allow counsel sufficient time to review and evaluate the allegations in the complaint, confer with the client about such review and evaluation, and then determine how to respond to plaintiff's complaint.

3. No party will be prejudiced by the requested continuance, and plaintiff does not seek preliminary injunctive or other emergency relief. Granting the extension will not delay resolution of this matter inasmuch as there is no trial date.

4. On May 15, 2014, counsel for LeadVision sought consent for the requested extension from plaintiff's counsel. On May 16, 2014, counsel for plaintiff, John Du Wors, Esq., indicated that plaintiff would not consent to the extension that LeadVision is seeking.

5. LeadVision does not seek an extension to unnecessarily delay these proceedings and has not requested any other extension of time in this case. LeadVision does not seek this extension for any improper purpose.

WHEREFORE, Defendant LeadVision Media, LLC d/b/a RevenueAds respectfully requests that this Court enter an order allowing it to respond to plaintiff's complaint on or before May 27, 2014.

Dated: May 16, 2014

Respectfully submitted,

s/ Judy Hamilton Morse  
Judy Hamilton Morse, OBA #6450  
- Of the Firm -  
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ATTORNEY FOR DEFENDANT,  
LEADVISION MEDIA, LLC,  
d/b/a REVENUEADS

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of May, 2014, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF Registrant:

Darren R. Cook, attorney for Plaintiff  
[drc@darrenrcook.com](mailto:drc@darrenrcook.com)

I further certify that on the 16th day of May, 2014, a true and correct copy of the foregoing document was mailed by first class mail, postage prepaid, to:

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*Attorneys for Plaintiff*

s/ Judy Hamilton Morse  
Judy Hamilton Morse